

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

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In re: : Chapter 11  
: :  
: Case No. 05-44481 (RDD)  
DELPHI CORP., *et al.*, : (Jointly Administered)  
: :  
Debtors. : :  
: -----X

**NOTICE OF APPEARANCE AND REQUEST FOR SERVICE OF  
PAPERS ON BEHALF OF HITACHI AUTOMOTIVE PRODUCTS (USA), INC.**

**PLEASE TAKE NOTICE** that the undersigned appear as counsel for Hitachi Automotive Products (USA), Inc. (“Hitachi”), a creditor in the captioned case, and pursuant to §1109(b) of the Bankruptcy Code and Bankruptcy Rules 2002 and 9010, requests that all notices given or required to be given in this case and all papers served or required to be served in the case, be given to and served upon the undersigned at the following addresses, telephone numbers and facsimile numbers:

SPECTOR & EHRENWORTH, P.C.  
30 Columbia Turnpike  
Florham Park, New Jersey 07102  
(973) 593-4800 (Phone)  
(973) 593-4848 (Fax)  
[bspector@selawfirm.com](mailto:bspector@selawfirm.com) (E-Mail)  
Attention: Brian D. Spector, Esq.

- and -

Tillie Lim, Esq.  
HAL/ERC-Legal  
Hitachi America, Ltd.  
50 Prospect Avenue  
Tarrytown, New York 10591-4698

**PLEASE TAKE FURTHER NOTICE** that pursuant to §1109(b) of the Bankruptcy Code, the foregoing request includes not only notices and papers referred to in the Bankruptcy Rules

specified above, but also includes, without limitation, orders and notices of any application, motion, petition, pleading, request, complaint or demand, whether formal or informal, whether written or oral, and whether transmitted or conveyed by mail, hand delivery, telephone, facsimile transmission or otherwise, that affects or seeks to affect any rights or interests of any creditor or other party in interest in this case with respect to the Debtors or the property of the Debtors;

**THIS ENTRY OF APPEARANCE AND REQUEST FOR NOTICE** is without prejudice to Hitachi's rights, remedies and claims against other entities or any objection that may be made to the jurisdiction or venue of the Court or venue of this case, and shall not be deemed or construed to be a waiver of Hitachi's rights (1) to have final order in non-core matters entered only after *de novo* review by a District Judge, (2) to trial by jury in any proceeding related in this case, (3) to have the District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal, or (4) any other rights, claims, actions, setoffs or recoupments to which Hitachi is or may be entitled, in law or in equity, all of which rights, claims, actions, defenses, setoffs, and recoupments Hitachi expressly reserves.

SPECTOR & EHRENWORTH, P.C.  
Attorneys for Hitachi Automotive Products (USA), Inc.

By: /s/ Brian D. Spector  
Brian D. Spector

Dated: October 14, 2005